

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE ETHICON, INC. PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY  
LITIGATION

CIVIL ACTION NO. 2:12-md-02327  
MDL No. 2327

Hon. Judge Joseph R. Goodwin

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**This document applies to:**

Debra Meadows, et al. v. Ethicon, Inc., et al.  
2:12-cv-03356

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ORDER  
REGARDING DISPOSITION OF NON-REVISION GYNECARE TVT  
PRODUCTS CASES**

NOW COMES the above-referenced Plaintiffs, by and through their undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT Products Cases (ECF Doc. 5313) set forth the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (ECF Doc. 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiffs are **not** included in Ethicon's list of plaintiffs who have not undergone a revision procedure. The above-named plaintiffs did not undergo a revision procedure and, therefore, are improperly excluded from Ethicon's motion. Plaintiffs' counsel has informed Ethicon that the above-named **plaintiffs should be included** in Defendants' motion pertaining to non-revision cases. Plaintiffs file this response to avoid unnecessary discovery to the extent that

Ethicon's motion is granted.

Respectfully submitted,

By: /s/ Benjamin J. Steinberg  
**BENJAMIN J. STEINBERG**

Benjamin J. Steinberg (NJ Bar # 015612010)  
Lopez McHugh, LLP  
214 Flynn Avenue  
Moorestown, NJ 08057  
P: (856) 273-8500  
F: (856) 273-8502 (fax)  
E-mail: bsteinberg@lopezmchugh.com

Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on March 16, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Benjamin J. Steinberg  
**BENJAMIN J. STEINBERG**

Benjamin J. Steinberg (NJ Bar # 015612010)  
Lopez McHugh, LLP  
214 Flynn Avenue  
Moorestown, NJ 08057  
P: (856) 273-8500  
F: (856) 273-8502 (fax)  
E-mail: bsteinberg@lopezmchugh.com